

1 Bradley S. Slighting, Esq.  
2 Nevada Bar No. 10225  
3 SLIGHTING LAW  
4 1707 Village Center Cir, Ste 100  
5 Las Vegas, NV 89134  
6 Tel: (702) 840-3749  
7 brad@slightinglaw.com

6 Chris Wellman, Esq.  
7 Pro Hac Vice  
8 California Bar No. 304700  
9 Wellman and Warren, LLP  
24411 Ridge Route Dr., Unit 200  
Laguna Hills, CA 92653  
Tel: (949) 580-3737  
[cwellman@w-wlaw.com](mailto:cwellman@w-wlaw.com)

11 *Attorneys for Defendants, David Imonitie,  
12 Spela Sluga, Devon Roeser, NVisionU, Inc.,  
Bass Grant, Lucas Longmire and Vince Murphy*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

15 INTERNATIONAL MARKETS LIVE INC.,  
16 a New York corporation dba IM MASTERY  
ACADEMY.

Case No. : 2:22-CV-01863-GMN-BNW

17 Plaintiff.

18 | v

19 DAVID IMONITIE an individual; SPELA  
20 SLUGA, an individual; DEVON ROESER,  
21 an individual; IVAN TAPIA, an individual;  
22 NVISIONU, INC., a Delaware corporation;  
23 ILYKIT, LLC, a Utah limited liability  
24 company, LUCAS LONGMIRE, an  
individual; NATHAN SAMUEL, an  
individual; MICHAEL ZHOR, an individual;  
25 IMRAN RICHIE, an individual; JUSTIN  
OWENS, an individual; PAULO  
26 CAVALLERI, an individual; JOSE  
MIGUEL CONTREAS, an individual; BASS  
27 GRANT, an individual; ANGELA  
CRUISHANK, an individual; JEFF  
28 CRUISHANK, an individual; VINCE  
MURPHY, an individual; GARY  
MCCSWEEN, an individual; KATRINA

**STIPULATION AND [PROPOSED]  
ORDER RE: EXTENSION OF TIME FOR  
FILING OF PAPERS RELATED TO  
PLAINTIFF'S MOTIONS TO DISMISS  
(ECF NOS. 152 AND 153)**

1 WORGESS, an individual; LUIS  
2 RONALDO HARNANDEZ ARRIAGA, an  
3 individual; STEPHANIA AYO, an  
4 individual; SILVIA AYO, an individual;  
5 CATALINA VASQUEZ, an individual;  
6 MATHIAS VASQUEZ, an individual;  
7 DOES 1 through 10, inclusive; and ROE  
8 CORPORATIONS I through X, inclusive,

9  
10 Defendants.

11 AND ALL RELATED MATTERS

12  
13 **STIPULATION AND [PROPOSED] ORDER**

14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28 Defendants/Counterclaimants David Imonitie (“Imonitie”) and Ivan Tapia (“Tapia”),  
Counterdefendant Christopher Terry (“Terry”), (collectively, the “Parties”) by and through their  
respective undersigned counsel of record, the law firms of Slighting Law, Wellman and Warren,  
LLP, James Dodge Russell & Stephens PC, Kerr Simpson Attorneys at Law and Holland & Hart  
LLP, hereby stipulate and agree to: 1) extend the deadline for Imonitie and Tapia to respond to  
Plaintiff’s Motions to Dismiss (ECF. Nos. 152 and 153); and 2) extend the deadline for Terry to  
reply to the responses filed by Imonitie and Tapia. The parties hereby specifically agree and  
stipulate as follows:

29  
30  
31  
32  
33  
34  
35  
36  
37  
38  
39  
40  
41  
42  
43  
44  
45  
46  
47  
48  
49  
50  
51  
52  
53  
54  
55  
56  
57  
58  
59  
60  
61  
62  
63  
64  
65  
66  
67  
68  
69  
70  
71  
72  
73  
74  
75  
76  
77  
78  
79  
80  
81  
82  
83  
84  
85  
86  
87  
88  
89  
90  
91  
92  
93  
94  
95  
96  
97  
98  
99  
100  
101  
102  
103  
104  
105  
106  
107  
108  
109  
110  
111  
112  
113  
114  
115  
116  
117  
118  
119  
120  
121  
122  
123  
124  
125  
126  
127  
128  
129  
130  
131  
132  
133  
134  
135  
136  
137  
138  
139  
140  
141  
142  
143  
144  
145  
146  
147  
148  
149  
150  
151  
152  
153  
154  
155  
156  
157  
158  
159  
160  
161  
162  
163  
164  
165  
166  
167  
168  
169  
170  
171  
172  
173  
174  
175  
176  
177  
178  
179  
180  
181  
182  
183  
184  
185  
186  
187  
188  
189  
190  
191  
192  
193  
194  
195  
196  
197  
198  
199  
200  
201  
202  
203  
204  
205  
206  
207  
208  
209  
210  
211  
212  
213  
214  
215  
216  
217  
218  
219  
220  
221  
222  
223  
224  
225  
226  
227  
228  
229  
230  
231  
232  
233  
234  
235  
236  
237  
238  
239  
240  
241  
242  
243  
244  
245  
246  
247  
248  
249  
250  
251  
252  
253  
254  
255  
256  
257  
258  
259  
260  
261  
262  
263  
264  
265  
266  
267  
268  
269  
270  
271  
272  
273  
274  
275  
276  
277  
278  
279  
280  
281  
282  
283  
284  
285  
286  
287  
288  
289  
290  
291  
292  
293  
294  
295  
296  
297  
298  
299  
300  
301  
302  
303  
304  
305  
306  
307  
308  
309  
310  
311  
312  
313  
314  
315  
316  
317  
318  
319  
320  
321  
322  
323  
324  
325  
326  
327  
328  
329  
330  
331  
332  
333  
334  
335  
336  
337  
338  
339  
340  
341  
342  
343  
344  
345  
346  
347  
348  
349  
350  
351  
352  
353  
354  
355  
356  
357  
358  
359  
360  
361  
362  
363  
364  
365  
366  
367  
368  
369  
370  
371  
372  
373  
374  
375  
376  
377  
378  
379  
380  
381  
382  
383  
384  
385  
386  
387  
388  
389  
390  
391  
392  
393  
394  
395  
396  
397  
398  
399  
400  
401  
402  
403  
404  
405  
406  
407  
408  
409  
410  
411  
412  
413  
414  
415  
416  
417  
418  
419  
420  
421  
422  
423  
424  
425  
426  
427  
428  
429  
430  
431  
432  
433  
434  
435  
436  
437  
438  
439  
440  
441  
442  
443  
444  
445  
446  
447  
448  
449  
450  
451  
452  
453  
454  
455  
456  
457  
458  
459  
460  
461  
462  
463  
464  
465  
466  
467  
468  
469  
470  
471  
472  
473  
474  
475  
476  
477  
478  
479  
480  
481  
482  
483  
484  
485  
486  
487  
488  
489  
490  
491  
492  
493  
494  
495  
496  
497  
498  
499  
500  
501  
502  
503  
504  
505  
506  
507  
508  
509  
510  
511  
512  
513  
514  
515  
516  
517  
518  
519  
520  
521  
522  
523  
524  
525  
526  
527  
528  
529  
530  
531  
532  
533  
534  
535  
536  
537  
538  
539  
540  
541  
542  
543  
544  
545  
546  
547  
548  
549  
550  
551  
552  
553  
554  
555  
556  
557  
558  
559  
5510  
5511  
5512  
5513  
5514  
5515  
5516  
5517  
5518  
5519  
5520  
5521  
5522  
5523  
5524  
5525  
5526  
5527  
5528  
5529  
55210  
55211  
55212  
55213  
55214  
55215  
55216  
55217  
55218  
55219  
55220  
55221  
55222  
55223  
55224  
55225  
55226  
55227  
55228  
55229  
55230  
55231  
55232  
55233  
55234  
55235  
55236  
55237  
55238  
55239  
55240  
55241  
55242  
55243  
55244  
55245  
55246  
55247  
55248  
55249  
55250  
55251  
55252  
55253  
55254  
55255  
55256  
55257  
55258  
55259  
55260  
55261  
55262  
55263  
55264  
55265  
55266  
55267  
55268  
55269  
55270  
55271  
55272  
55273  
55274  
55275  
55276  
55277  
55278  
55279  
55280  
55281  
55282  
55283  
55284  
55285  
55286  
55287  
55288  
55289  
55290  
55291  
55292  
55293  
55294  
55295  
55296  
55297  
55298  
55299  
552100  
552101  
552102  
552103  
552104  
552105  
552106  
552107  
552108  
552109  
552110  
552111  
552112  
552113  
552114  
552115  
552116  
552117  
552118  
552119  
552120  
552121  
552122  
552123  
552124  
552125  
552126  
552127  
552128  
552129  
552130  
552131  
552132  
552133  
552134  
552135  
552136  
552137  
552138  
552139  
552140  
552141  
552142  
552143  
552144  
552145  
552146  
552147  
552148  
552149  
552150  
552151  
552152  
552153  
552154  
552155  
552156  
552157  
552158  
552159  
552160  
552161  
552162  
552163  
552164  
552165  
552166  
552167  
552168  
552169  
552170  
552171  
552172  
552173  
552174  
552175  
552176  
552177  
552178  
552179  
552180  
552181  
552182  
552183  
552184  
552185  
552186  
552187  
552188  
552189  
552190  
552191  
552192  
552193  
552194  
552195  
552196  
552197  
552198  
552199  
552200  
552201  
552202  
552203  
552204  
552205  
552206  
552207  
552208  
552209  
552210  
552211  
552212  
552213  
552214  
552215  
552216  
552217  
552218  
552219  
552220  
552221  
552222  
552223  
552224  
552225  
552226  
552227  
552228  
552229  
5522210  
5522211  
5522212  
5522213  
5522214  
5522215  
5522216  
5522217  
5522218  
5522219  
5522220  
5522221  
5522222  
5522223  
5522224  
5522225  
5522226  
5522227  
5522228  
5522229  
55222210  
55222211  
55222212  
55222213  
55222214  
55222215  
55222216  
55222217  
55222218  
55222219  
55222220  
55222221  
55222222  
55222223  
55222224  
55222225  
55222226  
55222227  
55222228  
55222229  
552222210  
552222211  
552222212  
552222213  
552222214  
552222215  
552222216  
552222217  
552222218  
552222219  
552222220  
552222221  
552222222  
552222223  
552222224  
552222225  
552222226  
552222227  
552222228  
552222229  
5522222210  
5522222211  
5522222212  
5522222213  
5522222214  
5522222215  
5522222216  
5522222217  
5522222218  
5522222219  
5522222220  
5522222221  
5522222222  
5522222223  
5522222224  
5522222225  
5522222226  
5522222227  
5522222228  
5522222229  
55222222210  
55222222211  
55222222212  
55222222213  
55222222214  
55222222215  
55222222216  
55222222217  
55222222218  
55222222219  
55222222220  
55222222221  
55222222222  
55222222223  
55222222224  
55222222225  
55222222226  
55222222227  
55222222228  
55222222229  
552222222210  
552222222211  
552222222212  
552222222213  
552222222214  
552222222215  
552222222216  
552222222217  
552222222218  
552222222219  
552222222220  
552222222221  
552222222222  
552222222223  
552222222224  
552222222225  
552222222226  
552222222227  
552222222228  
552222222229  
5522222222210  
5522222222211  
5522222222212  
5522222222213  
5522222222214  
5522222222215  
5522222222216  
5522222222217  
5522222222218  
5522222222219  
5522222222220  
5522222222221  
5522222222222  
5522222222223  
5522222222224  
5522222222225  
5522222222226  
5522222222227  
5522222222228  
5522222222229  
55222222222210  
55222222222211  
55222222222212  
55222222222213  
55222222222214  
55222222222215  
55222222222216  
55222222222217  
55222222222218  
55222222222219  
55222222222220  
55222222222221  
55222222222222  
55222222222223  
55222222222224  
55222222222225  
55222222222226  
55222222222227  
55222222222228  
55222222222229  
552222222222210  
552222222222211  
552222222222212  
552222222222213  
552222222222214  
552222222222215  
552222222222216  
552222222222217  
552222222222218  
552222222222219  
552222222222220  
552222222222221  
552222222222222  
552222222222223  
552222222222224  
552222222222225  
552222222222226  
552222222222227  
552222222222228  
552222222222229  
5522222222222210  
5522222222222211  
5522222222222212  
5522222222222213  
5522222222222214  
5522222222222215  
5522222222222216  
5522222222222217  
5522222222222218  
5522222222222219  
5522222222222220  
5522222222222221  
5522222222222222  
5522222222222223  
5522222222222224  
5522222222222225  
5522222222222226  
5522222222222227  
5522222222222228  
5522222222222229  
55222222222222210  
55222222222222211  
55222222222222212  
55222222222222213  
55222222222222214  
55222222222222215  
55222222222222216  
55222222222222217  
55222222222222218  
55222222222222219  
55222222222222220  
55222222222222221  
55222222222222222  
55222222222222223  
55222222222222224  
55222222222222225  
55222222222222226  
55222222222222227  
55222222222222228  
55222222222222229  
552222222222222210  
552222222222222211  
552222222222222212  
552222222222222213  
552222222222222214  
552222222222222215  
552222222222222216  
552222222222222217  
552222222222222218  
552222222222222219  
552222222222222220  
552222222222222221  
552222222222222222  
552222222222222223  
552222222222222224  
552222222222222225  
552222222222222226  
552222222222222227  
552222222222222228  
552222222222222229  
5522222222222222210  
5522222222222222211  
5522222222222222212  
5522222222222222213  
5522222222222222214  
5522222222222222215  
5522222222222222216  
5522222222222222217  
5522222222222222218  
5522222222222222219  
5522222222222222220  
5522222222222222221  
5522222222222222222  
5522222222222222223  
5522222222222222224  
5522222222222222225  
5522222222222222226  
5522222222222222227  
5522222222222222228  
5522222222222222229  
55222222222222222210  
55222222222222222211  
55222222222222222212  
55222222222222222213  
55222222222222222214  
55222222222222222215  
55222222222222222216  
55222222222222222217  
55222222222222222218  
55222222222222222219  
55222222222222222220  
55222222222222222221  
55222222222222222222  
55222222222222222223  
55222222222222222224  
55222222222222222225  
55222222222222222226  
55222222222222222227  
55222222222222222228  
55222222222222222229  
552222222222222222210  
552222222222222222211  
552222222222222222212  
552222222222222222213  
552222222222222222214  
552222222222222222215  
552222222222222222216  
552222222222222222217  
552222222222222222218  
552222222222222222219  
552222222222222222220  
552222222222222222221  
552222222222222222222  
552222222222222222223  
552222222222222222224  
552222222222222222225  
552222222222222222226  
552222222222222222227  
552222222222222222228  
552222222222222222229  
5522222222222222222210  
5522222222222222222211  
5522222222222222222212  
5522222222222222222213  
5522222222222222222214  
5522222222222222222215  
5522222222222222222216  
5522222222222222222217  
5522222222222222222218  
5522222222222222222219  
5522222222222222222220  
5522222222222222222221  
5522222222222222222222  
5522222222222222222223  
5522222222222222222224  
5522222222222222222225  
5522222222222222222226  
5522222222222222222227  
5522222222222222222228  
5522222222222222222229  
55222222222222222222210  
55222222222222222222211  
55222222222222222222212  
55222222222222222222213  
55222222222222222222214  
55222222222222222222215  
55222222222222222222216  
55222222222222222222217  
55222222222222222222218  
55222222222222222222219  
55222222222222222222220  
55222222222222222222221  
55222222222222222222222  
55222222222222222222223  
55222222222222222222224  
55222222222222222222225  
55222222222222222222226  
55222222222222222222227  
55222222222222222222228  
55222222222222222222229  
552222222222222222222210  
552222222222222222222211  
552222222222222222222212  
552222222222222222222213  
552222222222222222222214  
552222222222222222222215  
552222222222222222222216  
552222222222222222222217  
552222222222222222222218  
552222222222222222222219  
552222222222222222222220  
552222222222222222222221  
552222222222222222222222  
552222222222222222222223  
552222222222222222222224  
552222222222222222222225  
552222222222222222222226  
552222222222222222222227  
552222222222222222222228  
552222222222222222222229  
5522222222222222222222210  
5522222222222222222222211<br

WHEREAS, on April 25, 2023, counsel for the Parties met and conferred via email and agreed to allow Plaintiff an additional two (2) weeks after the filing of Imonitie's and Tapia's responses to the Motions to Dismiss for Plaintiff to file replies, thereby making such replies due May 30, 2023.

WHEREAS, no Parties oppose the extension of time for the filing of briefing related to the Motions to Dismiss as set forth herein.

THEREFORE, the parties jointly stipulate that the Court should enter an order allowing Imonitie and Tapia to file their responses by May 16, 2023 and for Plaintiff to file its replies to the responses by May 30, 2023.

Respectfully submitted, this 2<sup>nd</sup> day of May 2023

## SLIGHTING LAW

/s/Bradley S. Slighting  
**Bradley S. Slighting, Esq.**  
Nevada Bar No. 10225  
1707 Village Center Cir, Ste 100  
Las Vegas, NV 89134

## **WELLMAN AND WARREN LLP**

/s/Chris Wellman  
**Chris Wellman, Esq. (Pro Hac Vice)**  
California Bar No. 304700  
Wellman and Warren, LLP  
24411 Ridge Route Dr., Unit 200  
Laguna Hills, CA 92653

*Attorneys for Defendants David Imonitie, Spela Sluga, Devon Roeser, NVisionU, Inc., Bass Grant, Lucas Longmire, Vince Murphy*

1 **HOLLAND & HART LLP**  
2

3 /s/ Lars K. Evensen  
4 Lars K. Evensen  
5 **Jenapher Lin, Esq.**  
6 Nevada Bar No. 14233  
7 9555 Hillwood Drive, 2nd Floor  
8 Las Vegas, NV 89134  
9

10 P. Sterling Kerr, Esq.  
11 Nevada Bar No. 3978  
12 George E. Robinson, Esq.  
13 **KERR SIMPSON ATTORNEYS AT LAW**  
14 2900 W. Horizon Ridge Parkway, Suite 200  
15 Henderson, NV 89052  
16

17 *Attorneys for Plaintiff*  
18

19 /s/  
20 Jon E. Field, Esq.  
21 **THOMPSON BURTON, PLLC**  
22 One Franklin Park  
23 6100 Tower Circle Suite 200  
24 Franklin, Tennessee 37067  
25

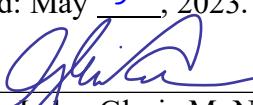
26 *Attorney for Defendant ILYKIT, LLC*  
27

28 /s/ Justin L. James  
1 Justin L. James, Esq. (Pro Hac Vice)  
2 **JAMES DODGE RUSSELL & STEPHENS PC**  
3 10 West Broadway, Suite 400  
4 Salt Lake City, Utah 84101  
5

6 *Attorney for Defendant Ivan Tapia*  
7

8 **IT IS SO ORDERED.**  
9

10 Dated: May 9, 2023.  
11

12   
13 Hon. Judge Gloria M. Navarro  
14 United States District Court Judge  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 2<sup>nd</sup> day of May, 2023, a true and correct copy of the forgoing document **STIPULATION AND [PROPOSED] ORDER RE: EXTENSION OF TIME FOR FILING OF PAPERS RELATED TO PLAINTIFF'S MOTIONS TO DISMISS (ECF NOS. 152 AND 153)** was filed with the Clerk of the Court using the CM/ECF system which automatically sent notification of such filing to and served electronically upon the following counsel who have entered an appearance in this action:

## E-SERVICE LIST

Jon E. Field, Esq.  
THOMPSON BURTON, PLLC  
One Franklin Park  
6100 Tower Circle Suite 200  
Franklin, Tennessee 37067  
Tele: (615) 465-6000  
Email: [jfield@thompsonburton.com](mailto:jfield@thompsonburton.com)

*Attorney for Defendant Ilykit, LLC*

P. Sterling Kerr, Esq.  
Nevada Bar No. 3978  
George E. Robinson, Esq.  
Nevada Bar No. 9667  
**KERR SIMPSON ATTORNEYS AT LAW**  
2900 W. Horizon Ridge Parkway  
Suite 200  
Henderson, NV 89052  
Phone: (702) 451.2055  
Fax: (702) 451.2077  
[sterling@kerrsimpsonlaw.com](mailto:sterling@kerrsimpsonlaw.com)  
[george@kerrsimpsonlaw.com](mailto:george@kerrsimpsonlaw.com)

Bradley S. Slighting, Esq.  
Nevada Bar No. 10225  
**SLIGHTING LAW**  
1707 Village Center Cir., Ste 100  
Las Vegas, NV 89134  
Tel: (702) 840-3749  
Email: [brad@slightinglaw.com](mailto:brad@slightinglaw.com)

Lars K. Evensen, Esq.  
Nevada Bar No. 8061  
Jenapher Lin, Esq.  
Nevada Bar No. 14233  
HOLLAND & HART LLP  
9555 Hillwood Drive, 2nd Floor  
Las Vegas, NV 89134  
Phone: (702) 669.4600  
Fax: (702) 669.4650  
[lkевенсен@hollandhart.com](mailto:lkевенсен@hollandhart.com)  
[jlin@hollandhart.com](mailto:jlin@hollandhart.com)

Justin L. James, Esq. (Pro Hac Vice)  
JAMES DODGE RUSSELL & STEPHENS PC  
10 West Broadway, Suite 400  
Salt Lake City, Utah 84101  
Tel: (801) 363-6363  
Email: jjames@jdrslaw.com  
*Attorney for Defendant Ivan Tapia*

*Attorneys for Plaintiff International Markets  
Live, Inc. dba IM Mastery Academy*

/s/ Bradley S. Slighting  
An employee of Slighting Law